

ORDER

KMC KING, MOENCH
& COLLINS LLP

ATTORNEYS AT LAW

PETER J. KING ♀

MATTHEW C. MOENCH *

MICHAEL L. COLLINS *

ROMAN B. HIRNIAK ^

KRISHNA R. JHAVERI *+
TIFFANY TAGARELLI

NAKICHA T. BARR

♦ Certified by the Supreme Court of New Jersey
as a Municipal Court Attorney
* Also Member of the New York Bar
+ Also Member of the Arizona Bar
^ Of Counsel

Writer's Address:

51 Gibraltar Drive, Suite 2F
Morris Plains, NJ 07950
(973) 998-6860

E-Mail:

mmoench@kingmoench.com

Red Bank Office:

365 Broad Street, Suite 4R
Red Bank, NJ 07701
(732) 546-3670

Website:

www.kingmoench.com



A limited liability partnership of Peter J. King, LLC, Moench Law,
LLC & Collins Law, LLC

September 16, 2022

VIA ELECTRONIC MAIL

Hon. Douglas E. Arpert
United States Magistrate Judge
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

RE: Caporale, et al. v. Cellco Partnership d/b/a Verizon Wireless,
Case No. 3:21-cv-20484-ZNQ-DEA

Peede, Jr. v. Cellco Partnership d/b/a Verizon Wireless,
Case No. 3:22-cv-00611-ZNQ-DEA

Dear Judge Arpert:

The undersigned represents Plaintiffs in the above-referenced matters. We write to provide Your Honor with Plaintiffs' proposal for how to proceed with these matters. Plaintiffs intend to move to amend the pleadings to add the Select Committee as a defendant in both cases. Plaintiffs propose a deadline of October 15, 2022, for filing these amended pleadings. After the Select Committee is added as a party to both cases, Plaintiffs and the Committee will propose a schedule for resolving the merits of both matters on dispositive motions with little to no discovery between the Committee and Plaintiffs. Plaintiffs believe this is the most efficient way to present the merits of these matters to the Court for resolution. Verizon takes no position on Plaintiffs' proposed motion. Both parties stand ready to answer any questions the Court may have or provide additional information the Court may request.

SO ORDERED:

Matthew C. Moench
MMJ

KING MOENCH & COLLINS, LLP

/s/ Matthew C. Moench

By: Matthew C. Moench, Esq.

cc: All counsel (via E-Mail)